

ROBOCALL MITIGATION PLAN

TALK TELECOM CORPORATION

ABOUT TALK TELECOM CORPORATION

Talk Telecom Corporation is a corporation formed under the laws of the State of Florida and is a registered carrier with the FCC.

The Company holds the FRN/CORES ID Number: 0021370424 and holds 499 Filer ID Number: 829427.

The Company has been in business for over 23 years providing resold wholesale termination services to business customers.

The Company resells wholesale termination of Carriers using the underlying service providers network since the Company has no facilities or switches to transport traffic in the United States. The Company does not use North American Numbering Plan resources and has no numbering authority.

The Company specializes in the reselling of wholesale VoIP termination which refers to the process of routing calls from a one carriers VoIP network to another VoIP network. However, in this case the Company acts as a “middle man” so to speak since it has no network facilities of its own and is a just reseller.

The term A-Z VoIP termination refers to the full, end-to-end service that allows VoIP calls to be routed from one network to another, all the way to the final destination.

This is where wholesale VoIP providers come in of which the Company is only a reseller with no network in the United States.

Wholesale VoIP minutes are bulk call minutes bought and sold between providers, typically at discounted rates. Businesses or service providers purchase these wholesale minutes to reduce their communication costs. These minutes are used for call termination, connecting international and local calls at a fraction of the price charged by traditional telecom companies.

The company does not have an active numbering plan in the United States and acts serving as a reseller only and having no switch, the Company has no “handling” presence in the call flow. The Company only resells bulk wholesale minutes of other providers.

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The Company primary place of business is:

Street: 9620 Highland Pointe Pass

City: Delray, Florida 33446

Main Number : (305) 297-8781

General email address: office.usa@talkcorporation.com Website:

<https://www.talkcorporation.com/>

Leaders of the company are:

CEO:

Name: Alexandre Dias de Souza

Street: 9620 Highland Pointe Pass

City: Delray, Florida 33446

Direct Dial: (305) 297-8781

Email Address:

adias@talkcorporation.com

DESIGNATED RMD CONTACT:

Name: Jorge Venicio Souza Azevedo

Street: 9620 Highland Pointe Pass

City: Delray, Florida 33446

Direct Dial: (305) 297-8781

Email Address: jorge.azevedo@talkcorporation.com

GUIDELINES TO PREVENT ILLEGAL CALLS:

Know Your Customer (“KYC”):

The Company has a rigorous KYC policy for the in order to support the Business Customers that it resells services to. The Company has an in-depth presales process where representatives of the Company work with the prospect or customer to understand all the unique factors of the Customer’s business. The objective of this is twofold: a. to get to know the customer; and b. to provide the best possible service to the customer by fully understanding all facets of their business.

The Company performs a thorough credit check on each of its customers and verifies the following information: legal business name, legal form of business, federal tax ID, nature of the

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business, primary contact person, and service address.

Not only does the Company have a rigorous intake and Onboarding process where it secures extensive information for Customers but all relationships between the Company and customers are governed by an MSA which specifically states the business Customer is not able to resell any services which the Company resells and the services which are sold to the Customer are strictly for the Customers own internal use.

The Company relies on its underlying carriers of which service the Company resells to other telecommunications companies to give notice if robocalls are detected.

The Company will work with its underlying carriers of which service the Company resells to other telecommunications companies to block calls originating from its customers, if necessary, due to fraudulent activity.

STIR/SHAKEN Implementation

Company has no defined implementation related to STIR/SHAKEN and the parameters of call authentication framework. And as a reseller with no switch the Company is unable to implement STIR/SHAKEN in any manner.

The Company has no control over the facilities and network infrastructure necessary to implement STIR/SHAKEN, such as access to a SIP header of a call; since the Company has no defined protocols in place.

Therefore, the Company is excluded from the FCC's STIR/SHAKEN implementation obligation pursuant to paragraph 40 of the FCC's First Call Authentication Report and Order.

Alternatively, the Company relies on underlying carrier partner(s), which own and maintain the network infrastructure, to implement and utilize STIR/SHAKEN authentication.

In relationship to the initial, and subsequent FCC Orders concerning STIR/SHAKEN and the Robocall Mitigation Database (RMD), the Company is without STIR/SHAKEN obligation.

NETWORK MONITORING AND CALL BLOCKING

The Company relies on its underlying carriers of which service the Company resells to other telecommunications companies to give notice if robocalls are detected.

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TRACEBACK AND INQUIRY & RESPONSE

The Company commits to respond to all inquiries made by the FCC, law enforcement, the ITG and/or any other like or similar governing body within 24 hours of initial. The Company is committed to combating any form of robocalling and other bad acts and violators of the TCPA.

The Company shall always fully cooperate with these groups to investigate and stop any illegal activity and persons who try to commit such bad acts from using Company's service to carry or process illegal calls.

When notified by any agency, the ITG, any regulatory governing concern and/or the FCC's Enforcement Bureau, Company immediately direct its underlying provider to block and report identified illegal traffic, and any substantially similar traffic, on an ongoing basis (unless Company's investigation determines that the traffic is not illegal).

If and when the Company determines that the identified traffic is not illegal, Company shall provide the Enforcement Bureau with an explanation as to why Company reasonably concluded that the identified traffic is not illegal, and what steps it took to reach that conclusion.

UPSTREAM PROVIDERS

Although the company currently has no upstream providers it will update this Plan when it does secure the services of upstream providers.

At present the company does not have its own switch or network.

COMPANY DECLARATION

The Company certifies that it has never been under investigation or committed any violations within the last two years with any local, state, or Federal agency or equivalent related to telemarketing or robocalling. Additionally, the Company is not currently subject to a formal action or investigation due to suspected unlawful robocalling or spoofing.

If when and as the Company business may change designated Company representatives only will update this RMP as appropriate.